

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**


**THE GENERAL LAND OFFICE OF
THE STATE OF TEXAS, and
GEORGE P. BUSH, in his official
capacity as Commissioner of the
Texas General Land Office,**

Plaintiffs,

V.

JOSEPH R. BIDEN, JR., in his official capacity as President of the United States of America; UNITED STATES DEPARTMENT OF HOMELAND SECURITY; and ALEJANDRO MAYORKAS, in his official capacity as Secretary of the United States Department of Homeland Security,

Defendants.




Civil Action No. 7:21-CV-00272

**THE STATE OF MISSOURI; and
THE STATE OF TEXAS,**

Plaintiffs,

V.

JOSEPH R. BIDEN, JR., in his official capacity as President of the United States of America; THE UNITED STATES OF AMERICA; ALEJANDRO N. MAYORKAS, in his official capacity as Secretary of the United States Department of Homeland Security; UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TROY A. MILLER, in his official capacity as the Acting Commissioner of the United States Border Protection; and UNITED



Civil Action No. 7:21-CV-00420

STATES CUSTOMS AND BORDER §
PROTECTION, Unites States §
Department of Homeland Security, §
§
Defendants. §

**UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF OF
AMICUS CURIAE PRESIDENT DONALD J. TRUMP
IN SUPPORT OF PLAINTIFFS' OPPOSED MOTION TO ENFORCE
PERMANENT INJUNCTION AND FOR A STATUS CONFERENCE**

COMES NOW President Donald J. Trump, by and through counsel, as *amicus curiae* in the above-captioned proceeding and respectfully requests leave to file his Brief of *Amicus Curiae* in support of Plaintiffs' Motion to Enforce Permanent Injunction (Doc. 230). President Trump's proposed Brief is attached to this Motion as Exhibit A. In support thereof, President Trump states:

1. Plaintiffs filed their Motion to Enforce Permanent Injunction and for a Status Conference (Doc. 230) on December 17, 2024;
2. President Trump, as detailed more fully in his Brief, has a heightened interest in the outcome of this Motion, in particular as President-Elect transitioning to become the 47th President of the United States, after the American people overwhelmingly elected him following his campaign pledge to fix the Southern Border and build the border wall;
3. President Trump, as *amicus curiae*, brings to the attention of this Court relevant arguments not already brought to its attention by the parties to the case and which will be of considerable help to this Court in deciding Plaintiffs' Motion; and
4. Counsel for President Trump has conferred with counsel for the parties, and they consent to the filing of President Trump's Brief of *Amicus Curiae*.

WHEREFORE President Trump respectfully requests leave to file his Brief of *Amicus Curiae*, attached as Exhibit A, and respectfully requests that, should the Court grant his Motion, the Clerk promptly file the Brief accordingly.

Dated: December 19, 2024

Respectfully submitted,

/s/ D. John Sauer
D. John Sauer
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Counsel for Amicus Curiae
President Donald J. Trump

*Pro Hac Vice Application pending

CERTIFICATE OF CONFERENCE

I hereby certify that, on December 18, 2024, I conferred with counsel for Plaintiffs and Defendants and that all parties consent to the filing of President Trump's Brief of *Amicus Curiae*.

/s/ D. John Sauer

CERTIFICATE OF SERVICE

I hereby certify that, on December 19, 2024, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ D. John Sauer